

1           IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT  
2                           IN AND FOR LEON COUNTY, FLORIDA

3  
4  
5       STATE OF FLORIDA,                           CASE NO. 2018-CF-001592  
6    SPN NO.: 255249  
7       vs.    DIVISION: HANKINSON  
8       DENISE WILLIAMS,  
9                    Defendant.  
10    \_\_\_\_\_/

11  
12  
13       DEPOSITION OF:                           WARD SCHWOOB  
14    Vol. 1, Pages 1 - 13  
15       TAKEN AT THE INSTANCE OF:            The Defendant  
16       DATE:                                     August 9, 2018  
17       LOCATION:                                 Room 311  
18    Leon County Courthouse  
19    Tallahassee, Florida  
20       TIME:                                     Commenced: 3:00 p.m.  
21    Concluded: 3:18 p.m.  
22       REPORTED BY:                            LISA GAINEY, RMR, RPR  
23    Notary Public in and  
24    for the State of  
25    Florida at Large

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A P P E A R A N C E S

Representing the State:

JON FUCHS

State Attorney's Office  
Leon County Courthouse  
Tallahassee, FL 32301

Representing the Defendant:

ETHAN ANDREW WAY

P. O. Box 10017  
Tallahassee, Florida 32302

\* \* \* \* \*

I N D E X

WITNESS:	PAGE
WARD SCHWOOB	
Direct examination by Mr. Way	4
Certificate of reporter	13

\* \* \* \* \*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

P R O C E E D I N G S

WARD SCHWOOB

was called as a witness, having been first duly sworn,  
was examined and testified as follows:

DIRECT EXAMINATION

BY MR. WAY:

**Q** Could you please state and spell your name  
for the record.

**A** My name is William H. Schwoob, Jr.,  
S-c-h-w-o-o-b. I'm also known as Ward.

**Q** And how are you presently employed?

**A** I'm a Crime Laboratory Analyst Supervisor  
with the Florida Department of Law Enforcement.

**Q** And how long have you been presently  
employed?

**A** With FDLE for 34 years.

**Q** We are here on the case -- it is referred  
to, I think, at FDLE level as the Mike Williams'  
disappearance. My client is Denise Williams. She is  
presently incarcerated, so we are going through this  
process of taking depositions. You are listed perhaps  
because of your preeminence at FDLE as one of the crime  
lab guys.

What did you do on this case? Short  
version.

1           A       Most recently was dug up the bones.

2           Q       So, that's you. You're the bone-digger-up  
3           guy?

4           A       Yeah.

5           Q       Did you do anything else besides dig up the  
6           bones?

7           A       In years previous, I did some stuff. I  
8           examined the vehicle that came in.

9           Q       Was this the Yukon?

10          A       I believe so, yes.

11          Q       We're going to kind of -- it's late in the  
12          day and we're going to kind of loosy-goosy with really  
13          bad questions. If you want to kind of tell me what you  
14          know. Is it the Yukon?

15          A       Yes.

16          Q       And there was nothing in the Yukon?

17          A       '95 Yukon. I searched it and found nothing.

18          Q       Let me ask you a question. It's kind of the  
19          Monica Lewinsky blue dress thing. Can organic material  
20          remain inside a vehicle for years and years and years?

21          A       Yes.

22          Q       If there was a large pool of blood, brain  
23          matter or other organic material in the back of a  
24          vehicle, could it have possibly been discovered even  
25          10, 15 or 20 years later?

1           A       Yes.

2           Q       And thus far you or FDLE, to the best of  
3 your knowledge, has not developed any physical evidence  
4 of any crime related to Mike Williams' disappearance in  
5 terms of Mike Williams' blood or DNA anywhere other  
6 than what we're going to talk about here as the body  
7 recovery?

8           A       That's correct.

9           Q       Body recovery, you went out there, dug him  
10 up and sent him to the lab and got it tested.  
11 Confirmed it was a DNA match. Did it match with his  
12 brother or mother?

13          A       I believe the sample is from his mother.

14          Q       Sample is from his mother. There was also  
15 clothing and effects that identified the body. So  
16 there's no doubt that's Mike Williams, right?

17          A       Correct.

18          Q       Now, let me ask you this question. You've  
19 been doing this for a long time. Do you have any  
20 experience with close contact wounds to the head with a  
21 shotgun?

22          A       Yes.

23          Q       Can you just describe generally what the  
24 result is of a close contact shot from a shotgun to a  
25 human skull?

1           A       It's rather traumatic. Normally, you'll  
2 find pellets. And if it's close enough, you'll find  
3 the wadding or the overcarrier of the shot shell in the  
4 wound itself.

5           Q       **Was that the case here that they found**  
6 **the --**

7           A       Yes.

8           Q       **So, that would be consistent with either a**  
9 **contact or close-contact wound?**

10          A       Close range, I'd say.

11          Q       **Less than six inches or so?**

12          A       I can't give a range. That's more firearms  
13 medical or medical examiner but --

14          Q       **But it's --**

15          A       -- closer than three feet.

16          Q       **-- closer than three feet. But it does**  
17 **cause trauma, including generally just sort of the**  
18 **removal of the face and the eyes and just --**

19          A       It can, yes.

20          Q       **And kind of leaves the occipital bones in**  
21 **place kind of bopping around back there. It's messy.**  
22 **Does it generate a lot of blood loss from the arterial**  
23 **spray?**

24          A       Yes.

25          Q       **And in your experience, would you expect to**

1 find, if the person was shot in the face at close range  
2 say from a distance from me to you, what do we call  
3 this? Three feet?

4 A Yes.

5 Q Would you anticipate there would be blood  
6 spray and/or brain matter or bone fragments or tissue  
7 that would possibly come back towards me or cover the  
8 distance between you and I?

9 A There would be blowback, yes.

10 Q And the blowback could also -- in addition  
11 to blowback, the blood continues to pump until the  
12 heart gets the message to stop working. You get a lot  
13 of blood or just a little bit right after the head  
14 trauma and the arterial spray?

15 A I'm not really comfortable --

16 Q If you're not, that's fine.

17 A I have a medical examiner --

18 Q We will get to that. But we do know from a  
19 forensic point of view, it's messy.

20 A Yes. Quite a bit of blood, yes, sir.

21 Q And if there was a body in the back of a  
22 vehicle that was being moved around, even if there was  
23 like a shirt or a bag or something over what was left  
24 of the head, there could be biological samples that  
25 would be possibly coming out?

1 A Yes, could be. Possibly.

2 Q Could be possibly. We haven't found any of  
3 that in this case?

4 A That's correct.

5 Q Aside from these two files that you have in  
6 front of you, is one the car, the truck?

7 A Yes.

8 Q The other is the body?

9 A Right.

10 Q You didn't prepare anything else?

11 A In here, there is an autopsy. I collected  
12 things from the autopsy and transported them to the  
13 lab, took photographs of all the artifacts, collected  
14 along with the body. They are also in there.

15 Q And we have those as well. Apparently, it  
16 is the shortest autopsy report I've ever seen. About a  
17 page long.

18 A Right.

19 Q Based upon the body being moved from the  
20 ground at Carr Lake, if Mr. Williams was, in fact, shot  
21 and killed at Carr Lake and his body was simply rolled  
22 on to a tarp and rolled into a hole, given the nature  
23 of the activity to recover the body, you would not be  
24 able probably to find any forensic evidence now because  
25 the earth was turned over looking for the body, or

1       could it still be possible that you could find organic  
2       material near where the body was recovered?

3             A       What kind of organic material?

4             Q       Blood, bone fragments or any kind of thing  
5       that would have DNA. Or would it be impossible given  
6       the nature of the area?

7             A       Never say impossible. Depends on how much  
8       time and energy somebody wanted to spend. If they  
9       wanted to sift that entire lake bed, they could.

10            Q       Did FDLE or any other agency do any search  
11       around where the body was covered to look for organic  
12       material consistent with whether or not the crime had  
13       taken place there.

14            A       Organic material?

15            Q       Brain, DNA stuff, brains, skull, eyeballs.

16            A       We excavated an area approximately 50 by 60.  
17       All that dirt and stuff was examined. It was examined  
18       for any potential evidence.

19            Q       And were you able to find anything or rule  
20       anything out or just --

21            A       We found a lot of lake bottom detritus.

22            Q       Is that because for a period of time that  
23       area had been under water?

24            A       Yes.

25            Q       Does that affect the ability to find organic

1 material if it's been under water and the water has  
2 receded?

3 A Depending on how much water intrusion got  
4 down to the level where the organic material was. If  
5 there was water intrusion, yes, it could destroy any  
6 organic material.

7 Q How did you guys scan for the organic  
8 material? Was there a test that did you for it or just  
9 eyeball it or --

10 A We excavated. We took a scoop out and we  
11 laid it down on wood. People raked through it for  
12 visually any items of evidence.

13 Q So, it would have to be larger items of  
14 evidence that would be visually observable like a bone  
15 fragment or something?

16 A Right.

17 Q Would you not be able to determine if there  
18 was blood or fluid or anything like that?

19 A That's correct.

20 Q So, you're looking, at this point, at hard  
21 objects, bone fragments and things of that nature?

22 A Correct.

23 MR. WAY: All right. I have nothing  
24 further. Mr. Fuchs?

25 MR. FUCHS: I don't have any questions at

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

this time.

(Proceedings concluded at 3:18 p.m.)

\* \* \* \* \*

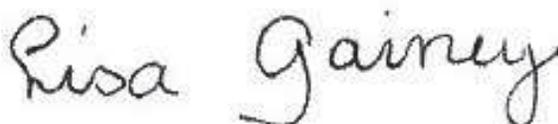
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE OF OATH

STATE OF FLORIDA )  
COUNTY OF LEON )

I, the undersigned authority, certify that the  
above-named witness personally appeared before me and  
was duly sworn.

WITNESS my hand and official seal this 12th day of  
November 2018.



---

LISA GAINERY  
Notary Public  
Commission: #EE198942  
Expires May 23, 2020

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE OF REPORTER

STATE OF FLORIDA )  
COUNTY OF LEON )

I, LISA GAINEY, Registered Professional Reporter, certify that the foregoing proceedings were taken before me at the time and place therein designated; that my shorthand notes were thereafter translated under my supervision; and the foregoing pages, numbered 1 through 13, are a true and correct record of the aforesaid proceedings.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties, attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 12th day of November 2018.



---

LISA GAINEY  
Notary Public  
Commission: #EE198942  
Expires May 23, 2020